
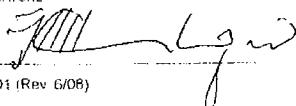


EXHIBIT 2

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

JULY 2015**001125**

PLAINTIFF'S NAME Festus Kandjabanga		DEFENDANT'S NAME Drexel University	
PLAINTIFF'S ADDRESS 1700 Ben Franklin Pkwy Apt 2315 Philadelphia PA 19103		DEFENDANT'S ADDRESS 3141 Chestnut Street Philadelphia PA 19103	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NO. OF DEFENDANTS 1	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Petition Action <input type="checkbox"/> Transfer From Other Jurisdictions <input type="checkbox"/> Notice of Appeal	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Jury <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Other <input type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> Commerce (Completion of Addendum Required) <input type="checkbox"/> Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival		
CASE TYPE AND CODE (SEE INSTRUCTIONS) Breach of Contract IC			
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS)			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) Kandjabanga Vs Drexel University-CMPLT			IS CASE SUBJECT TO COORDINATION ORDER? Yes No <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: Papers may be served at the address set forth below.			 15070112500003
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY Festus Kandjabanga		ADDRESS (SEE INSTRUCTIONS) 1700 Ben Franklin Pkwy Apt 2315 Philadelphia PA 19103	
PHONE NUMBER 267-973-7268	FAX NUMBER	E-MAIL ADDRESS Kandjabanga@yahoo.com	
SUPREME COURT IDENTIFICATION NO.		DATE July 10, 2015	
SIGNATURE 			

Served
AUG 05 2015
BY: KC

FILED
2015 JUL 10 PM 4:09
CLERK OF COURT

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA

Festus Kandjabanga
Plaintiff

JULY 2015

Us

001125

Drexel University
Defendant

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascender una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decider a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
Informacion Legal
One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

THE COURT OF THE STATE PENNSYLVANIA
COUNTY OF PHILADELPHIA

JULY 2015

FESTUS KANDJABANGA,
Plaintiff,
vs
DREXEL UNIVERSITY
Defendant

001125

THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA COURT OF COMMON PLEAS OF
PHILADELPHIA

Breach of Contract

The Complaint of the Plaintiff, FESTUS KANDJABANGA , respectfully shows and alleges as follows:

1. The Plaintiff herein, FESTUS KANDJABANGA, is a resident of the State of Pennsylvania at 1700 Ben Franklin Pkwy apt # 2315, Philadelphia.

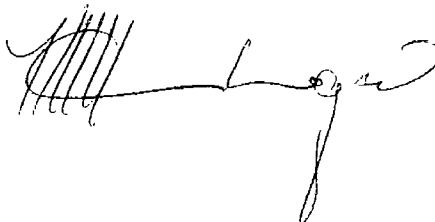
2. The Defendant herein, DREXEL UNIVERSITY, has a principal place of business at 3141 Chestnut St, Philadelphia, Pennsylvania 19104.
Defendant was admitted in the University in Fall 2011 as an Architectural Major which does not offer full time program. Plaintiff entered in an agreement since September 13, 2011 with Department of Architecture to go and complete his degree at Community College of Philadelphia. Plaintiff Festus filed a procedural application form with construction department on June 4, 2013 to go and complete his degree at Community College of Philadelphia when his status was still an Architecture which allowed him to go and transferred back the credit. The contract was maliciously breached by construction department on June 7, 2013 when plaintiff status was still Architecture before status was changed on June 10, 2013 or after.
3. Plaintiff filed a breach of contract on December 20, 2013. Plaintiff made a follow up on February 10, 2014 and November 15, 2014. Plaintiff was maliciously threatened on November 18, 2014 by Defendant with student conduct if he brought up the breach of contract complaint. Plaintiff made a follow a follow up again on April 17, 2015 with other complaints, Plaintiff was falsely arrested and put in handcuffs by University policy without an apology.

By grounds of the facts and circumstances of bad faith as stated above, plaintiff has suffered breach of contract and has been damaged by Defendant in the sum of \$120,000.00

WHEREFORE, Plaintiff demands judgment against Defendant in the sum of \$120,000.00, delay of graduation, expectation damages, consequential damages, liquidation damages, punitive damages with any other relief the court finds to be just and proper.

Dated: July 7, 2015

Cell 267-973-7268



Date of Review June 8, 2011Time of Review 4pmDrexel University
Department of Architecture & Interiors

Architecture Portfolio Review

Name of Reviewee FESTUS KAUDJOMONGAFormer (Colleges) CCP

The student's knowledge of the subject matter and prior credit attainment fulfills the requirements for the following course(s)

Studies Required Professional Courses (I, II, III)

1.1 1.2 1.3 <u>✓</u>	Arch Represent I Drawing Basic <u>✓</u>	Arch Represent II Drawing <u>✓</u>	Arch Represent III Digital Arch Represent IV 3D Modeling <u>✓</u>	Arch Construction <u>✓</u>
2.1 2.2 2.3 <u>✓</u>	Arch & Society <u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
3.1 3.2 3.3 <u>✓</u>	Arch & Structures <u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
4.1 4.2 4.3 <u>✓</u>	Environmental Sys <u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
5.1 5.2 5.3 <u>✓</u>	Professional Prac <u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
6.1 6.2 6.3 <u>✓</u>	Professional Elects <u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
List Theory Elects				

Reviewed by J. Arkeyville - TetrisDate 9/13/2011 & 6/27/2012

Comments:

Festus is concurrently finishing his degree at CCP. Once he has graduated from there, we will conduct another evaluation to transfer credits he has accrued since the Summer 2011.

UAC 9/13/2011

New transfer credits were granted for Arch & Society & Bldg. Systems.

UAC 6/27/2012

Subject: Followup to your recent communications

To: Festus kandjabanga <

Cc: O'Neal, Mary Beth <

Date: 11/15/14 2:45 PM

From: DiNardo, John <

Festus:

I was forwarded your communications of November 11th and November 17th which you sent to President Fry. It is my understanding that the issues you presented have been thoroughly addressed by the relevant offices, and their conclusions have been presented to you and fully documented. Unless you have new concerns or issues that have not been reviewed or addressed, it is important that you focus on your coursework to complete your degree in Construction Management. If you continue to raise the same issues that have been previously addressed, your behavior can be viewed as disruptive and may result in student conduct charges against you. We want you to be successful and, if you have new concerns that have not been addressed, I will be your point of contact.

Dr. DiNardo

H. John DiNardo, Ph.D.

To: fessy kandjabanga <kandjabanga@yahoo.com>

Sent: Monday, June 3, 2013 6:48 PM

Subject: RE: College Transfer website

Hi Fessy,

I am happy to better clarify what we discussed in our last meeting. I understood that you were already registered for courses and was currently completing the courses at Community College of Philadelphia and wanted to receive transfer credits for the courses. Since our last conversation, I learned that you haven't registered for the courses in which you would like to receive transfer credit. To receive permission to complete courses at another institution, you would need to complete the attached form.

Beard, Joena

To: fessy kandjabanga Festus Kandjabanga (fk85@drexel.edu)

Hi Fessy,

Please visit the SRC office on main campus **by 4PM on Monday, July 8, 2013** to complete your consultation to complete the process of your Change of Curriculum and Status for summer term.

Kind Regards,

Joena Beard

Academic **Advisor**

From: "Tsafos, James" <tsafosjm@drexel.edu>

To: fessy kandjabanga <kandjabanga@yahoo.com>

Cc: "Beard, Joena" <jcb63@drexel.edu>

Sent: Friday, June 7, 2013 2:09 PM

Subject: RE: Follow-up

Festus:

If Architecture wants to do that you will have to stay in Architecture the policy of the University is once you are matriculated your classes would be taken at Drexel. You will be in CM for the Summer according to your change of major.

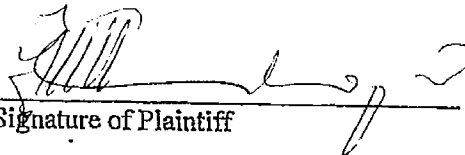
James M. Tsafos, Ph.D.

Program Manager-Construction Management

VERIFICATION

Plaintiff(s) Festus Kandabanga

hereby verify that the statements set forth in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief; I understand that these statements are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.


Signature of Plaintiff

Signature of Plaintiff

Dated: July 10, 2015

FOR COURT USE ONLY
 ASSIGNED TO JUDGE: _____
 ANSWER/RESPONSE DATE: JULY 20 2015
OFFICE OF JUDICIAL RECORDS
 Do not send Judge courtesy copy of Petition/Motion/Answer/Response.
 Status may be obtained online at <http://courts.phila.gov>

CONTROL NUMBER:
075141
 (RESPONDING PARTIES MUST INCLUDE THIS NUMBER ON ALL FILINGS)
JULY 2015

Festus Kandjabanga
 vs.
Drexel University

No. _____ Month 001125 Term, _____ Year _____

Name of Filing Party:
Festus Kandjabanga
 (Check one) ☐ Plaintiff ☐ Defendant
 (Check one) ☐ Movant ☐ Respondent

INDICATE NATURE OF DOCUMENT FILED:
☐ Petition (Attach Rule to Show Cause) ☐ Motion
☐ Answer to Petition ☐ Response to Motion

Has another petition/motion been decided in this case? ☐ Yes ☐ No
 Is another petition/motion pending? ☐ Yes ☐ No
 If the answer to either question is yes, you must identify the judge(s): _____

TYPE OF PETITION/MOTION (see list on reverse side)

PETITION TO PROCEED IN FORMA PAUPERIS

PETITION/MOTION CODE
 (see list on reverse side)

MTIFP

ANSWER/RESPONSE FILED TO (Please insert the title of the corresponding petition/motion to which you are responding):

I. CASE PROGRAM

Is this case in the (answer all questions):

A. COMMERCE PROGRAM

Name of Judicial Team Leader: _____
 Applicable Petition/Motion Deadline: _____
 Has deadline been previously extended by the Court?
☐ Yes ☐ No

B. DAY FORWARD/MAJOR JURY PROGRAM — Year _____

Name of Judicial Team Leader: _____
 Applicable Petition/Motion Deadline: _____
 Has deadline been previously extended by the Court?
☐ Yes ☐ No

C. NON JURY PROGRAM

Date Listed: _____

D. ARBITRATION PROGRAM

Arbitration Date: _____

E. ARBITRATION APPEAL PROGRAM

Date Listed: _____

F. OTHER PROGRAM:

Date Listed: _____

III. OTHER

II. PARTIES (required for proof of service)

(Name, address and telephone number of all counsel of record and unrepresented parties. Attach a stamped addressed envelope for each attorney of record and unrepresented party.)

Festus Kandjabanga
1700 Ben Franklin Pkwy
APT 2315
Philadelphia PA 19103

Kandjabanga Vs Drexel University-MTIFP



15070112500005

By filing this document and signing below, the moving party certifies that this motion, petition, answer or response along with all documents filed, will be served upon all counsel and unrepresented parties as required by rules of Court (see P.A. R.C.P. 206.6, Note to 208.2(a), and 440). Furthermore, moving party certifies that the answers made herein are true and correct and understands that sanctions may be imposed for inaccurate or incomplete answers.

(Attorney Signature/Unrepresented Party)

July 10, 2015
 (Date)

Festus Kandjabanga
 (Print Name)
 (Attorney I.D. (No.)

The Petition, Motion and Answer or Response, if any, will be forwarded to the Court after the Answer/Response Date.
 No extension of the Answer/Response Date will be granted even if the parties so stipulate.



First Judicial District of Pennsylvania
Court of Common Pleas of Philadelphia County
Trial Division – Civil

Festus Kandjabanga

Plaintiff(s)

JULY 2015

July
(month)

Term, 20 15
(year)

VS.

Drexel University

Defendant(s)

075141.

NO.

001125

In Forma Pauperis Order

AND NOW, this 10 day of July, 20 15, it is
hereby **ORDERED AND DECREED** that:

1. Petitioner be permitted to proceed without paying the costs of this proceeding or posting a bond.
2. Petitioner be permitted to obtain service of the papers filed without cost.
3. Petitioner be permitted to proceed *in forma pauperis* as to any additional costs which accrue in the course of this proceeding.
4. If there is a monetary recovery by judgment or settlement in favor of the party permitted to proceed *in forma pauperis*, the exonerated fees and costs shall be taxed as costs and paid to the Prothonotary by the party paying the monetary recovery.
5. Petitioner has a continuing obligation to inform the Court of any improvement in party's financial circumstances that will enable the party to pay costs.

6. If Petition for *In Forma Pauperis* is granted, filing party must appear and obtain attested copies of the original pleading for service. If more than thirty (30) days has expired, the pleading must be reinstated first.

BY THE COURT:

J.

First Judicial District of Pennsylvania
Court of Common Pleas of Philadelphia County
Trial Division – Civil

Festus Kandjabanga, pro se
(your name)

1700 Ben Franklin Pkwy
APT 2315
(full address)

Philadelphia PA 19103
(area code and telephone number)

075141

JULY 2015

Festus Kandjabanga
Plaintiff(s)

VS.

Drexel University
Defendant(s)

_____, TERM, 20_____
(month) (year)

001125

NO. _____

***Petition to Proceed In Forma Pauperis
and Without Payment of Bond***

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Petitioner, (your name) Festus Kandjabanga, seeks
(please print your name)

leave to proceed in this matter *in forma pauperis*, and respectfully represents that:

1. I am the (indicate plaintiff or defendant) Plaintiff in these proceedings.

2. I reside at (state your full address) 1700 Ben Franklin Pkwy
Apt 2315, Philadelphia, PA 19103

3. I have listed my sources and amounts of income truly and correctly on the attached affidavit.

4. I have the following average monthly expenses for the indicated items:

Housing: \$1185.00

Insurance: 0

Utilities: \$25.00

Transportation: \$100.00

(Gas): _____

Medical: 0

(Oil): _____

Loans: _____

(Electric): _____

Laundry: \$40.00

(Phone): \$60.00

Child Care: 0

Food: \$200.00

Child Support: 0

Clothing: \$140.00

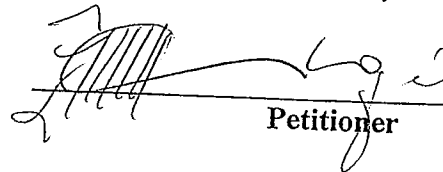
5. I neither own nor have equity in any assets other than the following (state values in dollars): _____

6. I am unable to pay the costs of these proceedings or to obtain the amount of costs from family or friends.

WHEREFORE, Petitioner prays that he/she be permitted to proceed in this matter *in forma pauperis* and without the payment of bond.

Date: July 10, 2015

Festus Kandabanga
Petitioner (Print your name)


Petitioner (Sign your name)

First Judicial District of Pennsylvania
Court of Common Pleas of Philadelphia County
Trial Division – Civil

Festus Kandjabanga, pro se
(your name)

1700 Ben Franklin Pkwy
APT 2315
(full address)

Philadelphia PA 19103
(area code and telephone number)

JULY 2015

TERM, 20____
(Month) (Year)

Festus Kandjabanga
Plaintiff(s)

VS.

Drexel University

Defendant(s)

001125

NO. _____

Petitioner's Affidavit
Pursuant to PA. R.C.P. 240

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF PHILADELPHIA

SS. 206-80-5463

1. I, Festus Kandjabanga, am the (Plaintiff) (Defendant)
(circle one)

in the above matter and because of my financial condition am unable to pay the fees
and costs of prosecuting or defending the action or proceeding.

2. I am unable to obtain funds from anyone, including my family and associates, to pay the costs of litigation.

3. I represent that the information below relating to my ability to pay the fees and costs is true and correct:

(a) Name: Festus Kandjabanga

Address: 1700 Ben Franklin Pkwy Apt 2315
Philadelphia PA 19103

(b) **EMPLOYMENT**

If you are presently employed, state:

Employer: N/A

Address: _____

Salary/wages
Per Month: _____

Type of Work: _____

If you are presently unemployed, state:

Date of last Employment: Sept 19, 2014

Salary/Wages
Per Month: Net \$844.00 per two weeks

Type of Work: Architecture

(c) **OTHER INCOME WITHIN THE PAST TWELVE (12) MONTHS**
(state as dollar amounts)

Business or Profession: N/A 0

Other Self-employment: 0

Interest: 0

Dividends: 0

Pension and Annuities: 0Social Security Benefits: 0Support Payments: 0Disability Payments: 0Unemployment Compensation &
Supplemental Benefits: _____

Workman's Compensation: _____

Public Assistance: _____

Other: Food stamp \$700.00 or \$190.00 Per month(d) **OTHER CONTRIBUTIONS TO HOUSEHOLD SUPPORT** (state as dollar amounts)(Wife) (Husband) (Friend) Name: Edward Garcia and Sofia ^{\$450.00}
~~\$1100.00~~

If your (wife) (husband) (friend) is employed, state:

Employer: ConsultantSalary/Wages
Per Month: _____Type of Work: ConsultantContributions
From Children: _____Contributions
From Parents: \$800.00Other Contributions: Food Stamp \$190.00(e) **PROPERTY OWNED** (state as dollar amounts)Cash: \$700.00Checking Account: 03600 1808 430 7014409Savings Account: N/ACertificates of Deposit: N/A

Real Estate

(Including Home): N/A

Motor Vehicle: Make: _____ Year: _____

Cost: \$ _____ Amount Owed: \$ _____

Stocks & Bonds: _____

Other: _____

(f) **DEBTS AND OBLIGATIONS** (state as dollar amounts)

Mortgage: _____

Rent: _____

Loans: \$50,000.00

Other: _____

(g) **PERSONS DEPENDENT UPON YOU FOR SUPPORT**

(Wife) (Husband) Name: N/A

Children, if any: _____ Age _____

_____ Age _____

_____ Age _____

_____ Age _____

Other Persons:

Name: _____

Relationship: _____

4. I understand that I have a continuing obligation to inform the Court of improvement in my financial circumstances which would permit me to pay the costs incurred herein.

5. I verify that the statements made in this affidavit are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Date: July 10, 2015

Festus Kandabanga
Petitioner (Print your name)

[Signature]
Petitioner (Sign your name)

Sworn to and subscribed before me

this 10 day of July, 2015

Donna Kelly
COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Donna Kelly, Notary Public
City of Philadelphia, Philadelphia County
My Commission Expires March 13, 2017
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Certificate of Service

I hereby certify that I have served a copy of this petition upon all other parties or their attorney of record by:

Please check:

☐ Regular First Class Mail

☒ Certified Mail

☐ Other

Date: July 10, 2015

Festus Kandjambang
Petitioner (Print your name)

[Signature]
Petitioner (Sign your name)